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David F. Staber

Counsel for Sanden International (USA), Inc.

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X	:	
In re	:	Chapter 11
	:	
GENERAL MOTORS CORP., et al.	:	Case No. 09-50026 (REG)
	:	
Debtors.	:	
	:	
-----X	:	

CURE OBJECTION OF SANDEN INTERNATIONAL (USA), INC.

ON OR ABOUT June 5, 2009, the Notice of (I) Debtors' Intent to Assume and Assign Certain Executory Contracts, unexpired Leases of Personal Property, and Unexpired Leases of Nonresidential Real Property and (II) Cure Amounts Related Thereto was served in this case. Sanden International (USA), Inc. ("Sanden") has reviewed the information contained in the data base regarding all executory contracts subject to assumption. Sanden has the following disputes regarding its contract cure amount.

Cure Amount	\$ 846,706.31
Supplier Total	\$1,884,741.98
Cure Dispute Amount	\$1,038,035.67

1.	Price Discrepancy	\$ 27,349.13
2.	Currency Discrepancy	\$ 48,217.47
3.	Investment Amortized	\$ 800,000.00
4.	Obsolesce Parts	\$ 159,013.68
5.	Samples shipped not paid	<u>\$ 3,455.39</u>
		\$1,038,035.67

Further detail on these amounts is set forth in Exhibit A attached hereto. Sanden respectfully requests to preserve its disputed amounts regarding its cure obligations.

Dated: June 15, 2009

Respectfully submitted

AKIN GUMP STRAUSS HAUER & FELD LLP

By: /s/ Philip C. Dublin
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing pleading was sent via U.S. Mail and via facsimile to the parties listed on the attached Service List on this the 15th day of June, 2009.

/s/ David F. Staber
David F. Staber

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